



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, New York 10007*

January 4, 2022

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl

John G. Koeltl, U.S.D.J.

1/5/22

*Knight First Amendment Inst. et al. v. Dep't of State et al.,
No. 20 Civ. 4911 (JGK)*

Dear Judge Koeltl:

We write respectfully on behalf of the parties in the above-referenced Freedom of Information Act (“FOIA”) case to provide the Court with a status report with regard to the remaining defendants’ processing of plaintiffs’ FOIA request. As set forth below, the agencies are nearing the end of their productions in response to the FOIA request.

Department of State: State has completed its response to the FOIA request to State.

Central Intelligence Agency: CIA has completed its response to the FOIA request to CIA. On December 28, 2021, CIA made a small production of additional documents that had been referred to CIA by NSA and ODNI.

Office of the Director of National Intelligence: On November 12, 2021, ODNI made a production of responsive, non-exempt records, which had been the subject of consultation requests to other agencies. ODNI recently received responses to the remaining consultation requests and expects to make its final production this week. With that production, ODNI will have completed its response to the FOIA request to ODNI.

Federal Bureau of Investigation: FBI has completed its productions, with the exception of documents referred to other agencies or entities for consultation for which FBI is still awaiting responses.

National Security Agency: NSA has completed its response to the FOIA request to NSA.

The parties respectfully suggest that they provide a further status report within 60 days, or by March 7, 2022. The parties are hopeful that they will be able to advise the Court at that time whether any issues remain to be litigated.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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